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6 UNITED STATES DISTRICT COURT
7 EASTERN DISTRICT OF WASHINGTON

8 ERIC WRIGHT, INDIVIDUALLY AND
IN HIS CAPACITY AS PERSONAL
9 REPRESENTATIVE OF THE ESTATE
OF STEVEN O. WRIGHT; AND, AMY
10 SHARP, INDIVIDUALLY,

11
12 Plaintiffs,

13 vs.

14 UNITED STATES OF AMERICA,
MEDFORD CASHION, M.D.; STAFF
15 CARE INC.,

16
17 Defendants.

No. 2:15-CV-0305-TOR

**SECOND DECLARATION OF
RUDY J. VERSCHOOR IN
SUPPORT OF DEFENDANT
UNITED STATES' MOTION FOR
SUMMARY JUDGMENT**

18 I, Rudy J. Verschoor, make the following declaration in lieu of affidavit
19 pursuant to 28 U.S.C. § 1746 to the best of my knowledge and belief.

20 1. I am an Assistant United States Attorney for the Eastern District of
21 Washington. I am the attorney assigned to defend the above-captioned action against
22 the United States. I make this declaration based on personal knowledge; I am over the
23 age of 18 years, and am competent to testify to these matters.

24 2. On May 4, 2017, I received Defendant Cashion's FRCP 26(a)(2) expert
25 disclosure from Dr. Cashion's counsel. This report was not yet available when the
26 United States filed its Motion for Summary Judgment on April 17, 2017. ECF No.
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SECOND DECLARATION OF RUDY J. VERSCHOOR IN SUPPORT OF
DEFENDANT UNITED STATES' MOTION FOR SUMMARY JUDGMENT - 1

1 94). Attached as **Exhibit 10** is a true and correct copy of the Preliminary Report
2 prepared by Dr. James Nania, M.D. on behalf of Defendant Medford Cashion, M.D.

3 3. Attached as **Exhibit 11** are true and correct excerpts from the deposition
4 transcript of Dr. Medford Cashion, whose deposition was taken in this case on
5 October 10, 2016.

6 4. Attached as **Exhibit 12** are true and correct excerpts from the deposition
7 transcript of Elizabeth Ford (Whitley), whose deposition was taken in this case on
8 October 24, 2016.

9
10 I declare under penalty of perjury that the foregoing is true and correct.

11
12 Dated this 19th day of May, 2017.

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14 
15 Rudy J. Verschoor